

EXHIBIT C

IULIIA POTAPOVA vs TOYOTA MOTOR CREDIT CORPORATION

30(b)(6)

Anthony Glasscock - Vol. 1 on 11/16/2023

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 -----X

4 IULIIA POTAPOVA, :

5 Plaintiff, :

6 v. : Case No.

7 TOYOTA MOTOR CREDIT : 1:23-CV-00571

8 CORPORATION, :

9 Defendant. :

10 -----X

11 VOLUME I

12

13 VIDEOTAPED VIDEO TELECONFERENCE

14 30(b)(6) DEPOSITION OF

15 ANTHONY GLASSCOCK

16 Thursday, November 16, 2023

17

18 Job No.: 00029248

19 Pages 1 - 241

20 Reported by: Lisa Barbera, RPR

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1 Q. Not to the plaintiff?

2 A. Correct.

3 Q. Okay. Do you know whether Toyota
4 considers that to be meaningful? We're going to
5 delete the first -- the initial signer as fraud
6 but not the person that's telling us that this is
7 fraud?

8 A. So we -- at the time our policy was to
9 simply -- because we don't get the information.
10 Right? I mean, you know, let's say -- let's make
11 the assumption one was from Equifax, one was from
12 TransUnion, one from -- was Experian. So they've
13 come to the conclusion that this individual is a
14 victim of identity theft.

15 They don't share with us what their
16 investigation looks like, nor do they share with
17 us generally any information that supports their
18 investigation or anything. So because of that,
19 you know, they've told us their -- this customer
20 is a victim of identity theft based on their
21 investigation. I don't have any way to know what
22 their investigation was like, and so at the time,

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1 if an item appeared on our block report, if an
2 individual appeared on our block report, our
3 process was to simply delete the tradeline.

4 Q. Okay. Could Toyota learn those things
5 that you just said you didn't know, the results of
6 their investigation, what it looked like?

7 A. They don't have a way for us to know
8 that.

9 Q. You can't call Experian or TransUnion
10 and say, Tell me more about this?

11 A. They won't -- they won't advise us of
12 anything -- any of their internal practices. They
13 consider that proprietary, so they won't divulge
14 that information to us.

15 Q. Well, have you ever tried that --
16 something specific when it comes to an entry on a
17 block report? Have you ever called TransUnion or
18 Experian or Equifax and said, I want to know more
19 about why this is on the block report?

20 A. I have not called them and asked them
21 that.

22 Q. So -- and then now we can go back to

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1 BY MS. STOKES:

2 Q. Okay. So it's safe to say if the credit
3 reporting agencies had believed there was a claim
4 of ID -- a verifiable claim of ID theft, they
5 would have sent the block report regarding
6 Ms. Potapova?

7 MR. MARCHIANDO: Object to form.

8 THE WITNESS: That's my understanding.

9 BY MS. STOKES:

10 Q. I'm sorry, Anthony, what did you say?

11 A. Yes, that's my understanding.

12 Q. And if Toyota had received the block
13 request specific to Ms. Potapova, they would have
14 deleted her tradeline?

15 A. Yes, at the time.

16 Q. At the time. Okay.

17 MS. STOKES: I have no more questions.

18 MR. MARCHIANDO: I just have a couple.

19 EXAMINATION BY MR. MARCHIANDO

20 BY MR. MARCHIANDO:

21 Q. So with regard to whether or not

22 Ms. Potapova might have appeared on a block

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1 CERTIFICATE OF SHORTHAND REPORTER

2

3 I, Lisa Barbera, Shorthand Reporter, the
4 officer before whom the foregoing deposition
5 was taken, do hereby certify that the
6 foregoing transcript is a true and correct
7 record of the testimony given; that said
8 testimony was taken by me stenographically
9 and thereafter reduced to typewriting under
10 my supervision; and that I am neither counsel
11 for or related to, nor employed by any of the
12 parties to this case and have no interest,
13 financial or otherwise, in its outcome.

14

15 IN WITNESS WHEREOF, I have hereunto set
16 my hand this 20th day of November, 2023.

17

18

19



20 LISA BARBERA

21 STENOGRAPHER

22

DEPOSITION ERRATA SHEET